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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

DEC - 4 2009  
FCC Mail Room

In the Matters of

International Comparison and Survey ) GN Docket No. 09-47  
Requirements in the Broadband Data )  
Improvement Act

A National Broadband Plan for Our Future ) GN Docket No. 09-51

Inquiry Concerning the Deployment of ) GN Docket No. 09-137  
Advanced Telecommunications Capability )  
to All Americans in a Reasonable and )  
Timely Fashion, and Possible Steps to )  
Accelerate Such Deployment Pursuant to )  
Section 706 of the Telecommunications )  
Act of 1996, as Amended by the )  
Broadband Data Improvement Act )

In the Matter of ) WC Docket No. 02-60  
Request of North Carolina Telehealth )  
Network for Extension of Funding )  
Deadline Under the Rural Health Care Pilot )  
Program )

**Comments Sought on Health Care Delivery Elements of National Broadband Plan**  
**NBP Public Notice #17**

GreatCall, Inc. hereby submits these brief comments to the Federal  
Communications Commission's (Commission) above referenced *Public Notice* released  
November 12, 2009.

**I. BACKGROUND**

GreatCall, Inc.<sup>1</sup>, based in San Diego, California, is the leader in delivering easy-

<sup>1</sup> Jitterbug is the leader in delivering a full range of wireless-based innovative, easy-to-use and life-enhancing services to people who seek simplicity. The company is differentiated from others through its high quality approach and through its ability to provide the best customer service

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to-use, affordable and life-enhancing services to people who seek simplicity. GreatCall files these comments on behalf of Jitterbug, its mobile phone service that offers easy-to-use features for those seeking simplicity and those who have hearing, visual, mobility or cognitive disabilities. GreatCall also offers services that are designed to improve the health and wellness of Jitterbug customers by using their mobile phone and customer service platform. Delivery of these services helps Jitterbug customers increase their compliance with healthcare regimens, provide tools for improving management of diseases, and provide increased communication and information flow between patients and healthcare providers.

Jitterbug is unique in that it does not believe that mobile health applications are applications at all, but that they are mobile health services. As such, every Jitterbug service is backed by live customer service representatives who are HIPAA (Health Insurance Portability and Accountability Act) trained and can assist customers with their mobile health service needs. For instance, if a customer needs assistance entering a glucose reading into their Jitterbug phone, they can dial an operator who will enter that reading for them directly through the customer service platform. It is this type of service that will be required to get consumers (particularly older consumers) comfortable and compliant with health services, and in turn increase their overall impact and benefit to the health care system.

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experience and relationship possible. The company has been widely praised for its ability to deliver the benefits of innovation and technology in an easy to use format. Jitterbug has received prominent national media accolades from the Wall Street Journal, BusinessWeek, The New York Times, Washington Post and major TV broadcast networks.

The Jitterbug cell phone and service is sold nationwide at leading retailers such as Sears, Radio Shack, CVS and ShopKo, as well as direct to consumers at 1-800-918-8543 and online at Jitterbug.com. Service coverage includes the U.S. and Canada. Jitterbug is located in San Diego, CA. For more information, please visit [www.jitterbug.com](http://www.jitterbug.com).

## **II. HEALTH CARE DELIVERY ELEMENTS OF NATIONAL BROADBAND PLAN**

In the *Public Notice*, the Commission seeks information on Health Care Delivery Elements of the National Broadband Plan. GreatCall's comments focus on Sections 2d and 2e of the Public Notice regarding the underlying IT infrastructure necessary to support successful implementation of current and emerging health IT applications for mobile and other portable remote monitoring systems and applications that enable or cause advanced healthcare delivery.

GreatCall agrees with the Commission that numerous health IT applications are being deployed using public and private communications networks. In fact, GreatCall, through its wireless phone service, Jitterbug, offers unprecedented services that promote delivery of healthcare and wellness services by providing remote monitoring and other advanced healthcare delivery services. These services include:

Live Nurse - In partnership with FONEMED®, Jitterbug offers LiveNurse™ service that offers 24-hour access to live, registered nurses anytime a customer needs to ask a health-related question. This service offers health care advice whenever a customer has a question or needs information about their health and well-being. Assistance is available in both English and Spanish, 24 hours a day, 7 days a week. In addition, the following additional health-related services are available via Live Nurse.

Health Information Library - Offers 24-hour access to a pre-recorded health library, featuring current information on hundreds of general health topics.

Customers can ask the nurse to connect them to a library to learn about the topic of their choice.

Updated Personal Health History - Helpful nurses document the health topics each time a customer calls, allowing them to better serve the customer by addressing their specific issues or concerns the next time they call. The Jitterbug LiveNurse Program is not used in case of emergencies or as a substitute to dialing 911. The FONEMED registered nurses assist with making health care decisions, but do not prescribe medications or diagnose.

Jitterbug Wellness Calls. Medical research has proven that a positive state of mind plays a major role in creating life-long health and wellness. The Jitterbug Wellness Call is an empowering, motivational health and wellness service that delivers professional, proven techniques so customers can improve their well-being. Based on the customer's own participation, this personalized service promotes a healthier life. It is a powerful way to learn, integrate and practice the wellness techniques that work for life-long success. The call is interactive and allows a customer to track the trending of their well-being over time. The Jitterbug Wellness Call is created exclusively for Jitterbug customers and in partnership with the world-renowned wellness expert Dr. Brian Alman, Ph.D.

In addition, in early 2010, GreatCall will offer additional services to promote more efficient and advanced health care services. They will include:

Jitterbug Personal Emergency Management Service. With Jitterbug Emergency Management Service, at the touch of a button a customer will be connected to their own personal emergency operator that knows who they are, where they are, their medical background, can conference in friends or family, and can dispatch 911 if necessary.

Jitterbug Check In Calls. Jitterbug's "Check-In" Call service will allow individuals with disabilities, that are medically at-risk and/or senior citizens (who would normally need home care or other types of assisted living) to reside in their homes longer with the added security that someone will check on them on a regular basis. This offering will be a dependable; effective automated calling service on the days and times the customer chooses. The customer will be instructed to acknowledge that they are OK by pressing the "YES" button on the Jitterbug phone. If the call is not answered or the customer indicates they are not feeling well or requests assistance by pressing the "NO" button, an alert sequence will be initiated that calls and/or emails their care providers, family, friends, or neighbors according to the assurance call set-up.

Jitterbug Medication & Prescription Refill Reminders. This service will provide a friendly reminder personalized for customer medication programs. The customer will receive a call to remind them to take the correct dosage of medicine at a specific time. The Jitterbug Health & Wellness specialist will enter the customer's prescription information and schedule. The customer will begin receiving phone calls on their Jitterbug phone that reminds them of the schedule and inquires whether the customer has taken the medication. The customer's MyJitterbug.com account will monitor the reminders. This service was successfully trialed in 2009 in conjunction with Meridian Healthcare where patients increased medication compliance from 60% to over 90% in a 6 months trial period.

Jitterbug Diabetes Management. Jitterbug has partnered with WellDoc Communications, the leader in Diabetes Management solutions, to provide a simple way to enter glucose readings on the Jitterbug phone and receive real-time coaching and recommendations

regarding the customer's condition on their phone. The service will enable customers to track long term trends of their progress on their MyJitterbug.com account, receive coaching and feedback based on the longer trends, keep loved ones and healthcare teams aware of their progress, and print out reports and a complete log book for the customer's doctor so they can be more informed. The WellDoc solution has been tested in clinical trials and has proven to reduce A1c levels in more individuals than those who receive normal medical care.

The Commission specifically seeks comments on what communication services are key to supporting these healthcare applications. All of the above healthcare services are made available by using Jitterbug's existing nationwide mobile coverage area that serves urban and rural customers alike; all using 1xRTT data speeds and voice channels (no 3G bandwidth is required). No additional spectrum or bandwidth is currently needed to support the provision of the above services. Each customer has a My Jitterbug account that enables him or her to manage or change their services or personalize their experience via an Internet login or by calling a 24-hour operator. For instance, each MyJitterbug account is a personal, password protected, online resource that permits an individual to order a specific health and wellness service, or to update their phone book, review their monthly bill, update their personal information, or address any other service issue at anytime, day or night. In addition, all service changes requested by the individual are implemented instantly over-the-air via the Internet at MyJitterbug.com or via the 24-hour operator service. Thus, GreatCall would like to emphasize that most of the benefits of these and other mobile health services are available using existing mobile technology and coverage areas. There is little need for additional bandwidth or additional

spectrum frequency to provide these or similar services. The greatest need for provisioning these important health services is greater awareness and additional capitation models that will in turn encourage Medicare providers to invest in the health care cost reduction benefits of these and other mobile health services.

*What are the specific network requirements (e.g., transmission speeds, minimum guaranteed bandwidths, latency, jitter, reliability, coverage, others)? How might these differ based upon the content (e.g., text, image, or video) of the application? We welcome detailed network requirement analyses for pertinent applications.*

*What issues may exist in ensuring that requirements in (i) are met on an end-to-end basis? Can such requirements easily be met across multiple service provider networks?*

GreatCall believes implementation of standardized data roaming would help ensure maximum data coverage for mobile health applications.

*How might application usage by individuals (patients and doctors) both in their homes and on a mobile basis affect network requirements? How might these requirements vary by the content (e.g., text, image, or video) of the application? We welcome detailed network requirement analyses for health IT applications in both home and mobile settings.*

GreatCall strongly believes that in order for any mobile health application or service to have a real impact in the short-term, the application or service must provide a seamless and simple experience across the mobile and online network, with automatic syncing between the online and mobile experience. Preferably, health care services could be run on a mobile platform to ensure availability to people without access to the Internet. However, Internet access adds an additional robustness to health care services. Any application that requires a technician site visit to set up broadband access and monitoring equipment would be difficult to implement due to cost constraints. For instance, a truck roll can cost as much as \$1,000 or more. Further, applications that run on the mobile platform are less likely to require a technician site visits as they offer a solution that works “right out of the box” and can be managed remotely.

*What should be the role of the federal government in ensuring the connectivity necessary to enable promising health IT applications? We welcome specific policy suggestions, as well as cost/benefit analyses and tracking mechanisms.*

The federal government should modify the incentives of the payors and providers in the healthcare industry such that those healthcare players are motivated to improve the wellness of their members. More capitation models, particularly in Medicare, would push innovation to the private sector such that their profits would increase directly with the general wellness of their members' population. This is in stark contrast to the fee-for-service model that does not promote wellness.

### **III. CONCLUSION**

GreatCall commends the Commission for initiating this Public Notice to establish a plan that will foster advanced health information technology and broadband infrastructure and services that will advance our Nation's health care delivery system. GreatCall appreciates the opportunity to submit comments in this important proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Inn', is written over the signature line.

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